

APPENDIX 2

Interrogatories Defendants Claim Are Multiple

The following interrogatories are those that defendants claim contain multiple interrogatories. The numbers in brackets represent roughly how the defendants characterized the separate interrogatories in their objections and responses.

Interrogatory No. 4, First Set:

[1] Detail the process of obtaining a Texas driver license, including, but not limited to, the requirements for its issuance, the amount DPS charges for issuance, the delay (if any) between application and issuance, [2] the underlying identification or documentation that a person must present to obtain a driver license, and [3] the process (including requirements) for obtaining such underlying identification.

Interrogatory No. 5, First Set:

[1] Detail the process of obtaining a DPS-issued personal identification card, including, but not limited to, the requirements for its issuance, the amount DPS charges for issuing one, the delay (if any) between application and issuance, [2] the underlying identification or documentation that a person must present to obtain such personal identification card, and [3] the process (including requirements) for obtaining each form of underlying identification.

Interrogatory No. 6, First Set:

[1] Detail the process of obtaining an EIC, as used in Section 63.0101 of the Texas Election Code (as amended by SB 14), including but not limited to each and every location in the State of Texas at which a person may obtain an EIC (including mobile and temporary locations) and each location's hours of operation, the requirements for issuance of an EIC, the delay (if any) between application and issuance, [2] the underlying identification or documentation that a person must present to obtain an EIC, and [3] the process for obtaining each form of underlying documentation.

Interrogatory No. 7, First Set:

[1] Detail the process of obtaining a Texas license to carry a concealed handgun, including but not limited to the requirements for its issuance, the amount charged for its issuance, the delay (if any) between application and issuance, [2] the underlying identification or documentation that a person must present to obtain a license to carry a concealed handgun, and [3] the process (including requirements) for obtaining each form of underlying

documentation.

Interrogatory No. 8, First Set:

[1] Identify any and all specific complaints, allegations, investigations, or charges of in-person voter impersonation or other in-person voter fraud that occurred or are alleged to have occurred in the State of Texas from January 1, 2000, to the present. In response to this interrogatory, please include the date; place; election; persons involved; nature or method of the alleged, actual, or attempted fraud; disposition or outcome of the alleged, actual, or attempted fraud; and [2] whether the instance was reported or made known to the Texas Legislature.

Interrogatory No. 10, First Set:

In those instances when a voter appears to vote in person without required identification under Texas Election Code § 63.0101 (as amended by SB 14), [1] detail the process and procedures that a poll official must follow to allow a person to cast a ballot (specifying which procedures result in a regular ballot and which procedures result in a provisional ballot), [2] including identifying those steps in the process where a poll official may exercise his or her discretion as to the type of ballot that person would be entitled to cast.

Interrogatory No. 11, First Set:

In those instances when a voter appears in person to vote and presents a photographic identification of the type that complies with Texas Election Code § 63.0101 (as amended by SB 14), [1] detail the process and procedures that a poll official then must follow, including the process and procedures to determine whether that photographic identification contains information that precisely matches the voter's record in the poll book and [2] the process and procedures to allow the prospective elector to cast a ballot if the poll official concludes that the requisite precise match between the photographic identification and the poll book does not exist [3] (specifying which procedures result in a regular ballot and which procedures result in a provisional ballot and [4] identifying the steps in this process where a poll official may exercise his or her discretion regarding the type of ballot that the voter would be entitled to cast).

Interrogatory No. 15, First Set:

[1] Identify any study or analysis (past, current, or proposed, regardless of the author) of which Defendants are aware that undertook or is undertaking to review, analyze, determine, or document the effect of SB 14, or any other photographic voter identification proposal in Texas, on Texas citizens,

registered or unregistered (including, but not limited to, financial effects, lack of access to identification, the number of Texas citizens who do not possess the specific forms of identification included in SB 14, and the effect of implementation SB 14 in 2013 elections), and [2] include a description of each such study or analysis's structure and methodology, along with all results and conclusions. In answering this interrogatory, please construe effect to include polling place delays, individuals turned away from the polling place without casting a ballot, casting of provisional ballots (both those eventually counted and those that were not), and mail balloting by individuals eligible to do so.

Interrogatory No. 28, First Set:

[1] Identify all Texas State and local public agencies and entities that issue or are authorized to issue photographic identification and [2] state the eligibility requirements for obtaining a form of photographic identification from each such agency or entity.

Interrogatory No. 1, Second Set:

For each date between January 1, 2006, and November 1, 2011 on which a person had to provide documentation to prove U.S. citizenship or lawful U.S. presence to obtain a Texas driver's license or DPS personal identification card, [1] identify the documents that were acceptable to prove U.S. citizenship, and [2] identify by specific citation (including date) each statute, rule, other authority, or other writing authorizing the Department to request or require such proof.

Interrogatory No. 2, Second Set:

As of April 18, 2014 (or any other named date since November 1, 2013), state the number of holders of non-expired Texas driver licenses or DPS personal identification cards who are [1] (1) U.S. citizens for whom DPS records reflect that they have satisfied the current requirements for documentary proof of U.S. citizenship; [2] (2) persons whom DPS records list as U.S. citizens but for whom the records do not reflect that they have satisfied the current requirements for documentary proof of U.S. citizenship; [3] (3) persons for whom DPS records do not list a country of citizenship; and [4] (4) persons for whom DPS records list a foreign country as the country of citizenship.